

EXHIBIT 6

Feigenbaum, Steven

From: Feigenbaum, Steven
Sent: Wednesday, March 20, 2019 4:05 PM
To: Gerard Filitti; Michael Radine
Cc: Adams, Haley
Subject: RE: BNY Mellon

Gerard: It's now been three weeks since you got access to BNYM's revised spreadsheet, and though you told me on 2/28 that you would revert to us the following week, we're receiving your list of alleged deficiencies only now. We will forward your email to BNYM and discuss with them the alleged deficiencies you've identified and the extent to which they can be remedied. But given what you're now asking for, BNYM will be unable to comply with your requests before we would need to begin work on an opposition to the motion to compel. Please let me know, then, as soon as possible, and preferably by tomorrow, whether you're amenable to asking the judge to extend the current stay to give BNYM sufficient time to address the matters you've raised. I suggest that the extension be to April 19 – the time by which plaintiffs would report to the judge – to make it consistent with the new extension granted to Credit Suisse on Monday.

Steve

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From: Gerard Filitti [mailto:gfilitti@osenlaw.com]
Sent: Wednesday, March 20, 2019 3:21 PM
To: Feigenbaum, Steven; Michael Radine
Cc: Adams, Haley
Subject: RE: BNY Mellon

Steve,

Thank you for your e-mail. After reviewing BNY's production, we note some significant deficiencies.

First and foremost, 20 of the approximately 48 fields in the spreadsheet have been redacted. In light of Protective Order entered by the Court, these redactions are neither necessary nor appropriate, and we request that BNY supplement its production with unredacted records. An additional 12 fields do not appear to be redacted, but have no content (or minimal content) in the respective fields. We request that BNY confirm whether these fields were intentionally left empty.

There are 6 additional redactions that we believe to be inappropriate:

- a. Bank Melli:G:14 ("PLxxxxxxxxxxxxxxxxxxxxxx6854");
- b. Bank Melli:N:14 ("PLxxxxxxxxxxxxxxxxxxxxxx6854");
- c. Central Bank of Iran:G:2 ("XXXXXXXX1101");
- d. Central Bank of Iran:N:2 ("XXXXXXXX1101");
- e. Central Bank of Iran:G:3 ("XXXXXXXX1101"); and,
- f. Central Bank of Iran:N:3 ("XXXXXXXX1101").

Please produce the unredacted data for those fields.

With respect to each SWIFT message associated with a Subject Entity, we call for the production of the data contained in the following fields (including any subparts): 1-3, 5, 13, 20, 21, 23, 25, 26, 28, 30, 32, 33, 36, 50-59, 70-72, 75-77, 79, 82, 83, 87, and 94. The records for some, but not all, of these fields have been produced. We request that BNY supplement its production by either populating a spreadsheet with these fields from its database, or produce the SWIFT messages themselves.

We further request that BNY identify whether it has included database records relating to any payment orders involving the Subject Entities that were blocked, frozen or rejected. We also request that BNY identify whether it searched for SWIFT messages from each of SWIFT's nine message series (e.g., 100-series messages, 200-series messages, etc.). Finally, we are unclear as to the meaning of the phrase "FTD IRAN EMBARGO" in the "Debiting Bank Name" column of the spreadsheets. Please provide an explanation.

Best,
Gerard

Gerard Filitti
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From: Feigenbaum, Steven <sfeigenbaum@katskykorins.com>
Sent: Monday, March 18, 2019 3:28 PM
To: Gerard Filitti <gfilitti@osenlaw.com>; Michael Radine <mradine@osenlaw.com>
Cc: Adams, Haley <hadams@katskykorins.com>
Subject: BNY Mellon

Gerard/Michael: Having heard nothing to the contrary, I trust that you deem BNY Mellon to be in compliance with the Gill and Hake subpoenas, that plaintiffs' motion to compel, as to BNY Mellon, will soon be withdrawn, and that BNY Mellon therefore will not need to oppose the motion. But can you please confirm as much as soon as possible? You need to advise the judge by next Monday whether the motion is moot as to BNY Mellon, and we would need to start work soon on opposition papers if the motion is not withdrawn.

Steve

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